

**COMMONWEALTH OF MASSACHUSETTS**  
**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Investigation by the Department of  
Telecommunications and Energy on its own motion  
pursuant to G.L. c. 159, §§ 12 and 16, into Verizon  
New England Inc., d/b/a Verizon Massachusetts'  
provision of Special Access Services.

D.T.E. 01-34

**WORLDCOM'S AND AT&T'S FOURTH SET OF INFORMATION  
REQUESTS TO VERIZON**

WorldCom, Inc., and AT&T Communications of New England, Inc., submit to Verizon  
Massachusetts ("Verizon") the following information requests. Please provide responses to these  
requests as they are completed.

**Instructions**

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.
2. Please provide answers as they are completed.
3. These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.
4. If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.
5. If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.
6. If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.
7. Please refer to the definitions below in providing responses.

8. All uses of the conjunctive include the disjunctive and vice versa. Words in the singular include the plural and vice versa.
9. Unless otherwise indicated, your responses should cover the period from January 1, 1998, to the present.
10. Each response should identify documents sufficient to demonstrate the grounds of the response. Copies of such documents, with clear indication of the particular question to which each document or group of documents is responsive, may be produced in lieu of such identification.
11. For each response, provide a detailed explanation of the methodology used to calculate the response, including the system(s) from which the data was extracted; any data included/excluded from the calculation; and the methodology and/or calculations used.
12. If you cannot answer a question or any portion of a question, answer what portions you can answer and provide a detailed explanation as to why the remainder cannot be answered. If you cannot answer a question or portion of a question because you do not compile data or keep records in a manner that permits you to answer the question, (a) state that as the reason and provide a detailed description of the manner in which you do compile the requested data or records; and (b) provide the best available data or information in whatever format it is kept.
13. Where indicated, the content of your answers should be separately broken out by:
  - a. Report Dimensions
    - (i) Verizon Retail
    - (ii) Non Affiliated Carriers Aggregate
    - (iii) Affiliated Carriers Aggregate
  - b. Service Disaggregation for each Report Dimension
    - (i) Interstate DS0, DS1, DS3, OCn by tariff under which the circuits (as defined in Instruction No. 14) have been ordered, including but not limited to:
      - a. FCC 11
      - b. FCC Other
    - (ii) Intrastate DS0, DS1, DS3, OCn by tariff under which the circuits (as defined in Instruction No. 14) have been ordered, including but not limited to:

- (a) D.T.E. 10
- (b) D.T.E. 15
- (c) D.T.E. Other

14. Any request for the number of circuits for any time period (*e.g.*, circuits ordered or requested, or circuits installed or completed) refers to facilities (DS0, DS1, DS3, OCn) over which special services of any kind may be provided, regardless of the tariff under which the service is ordered.

### **Definitions**

**ASR** means Access Service Request.

**Affiliated Carrier** means a carrier customer of Verizon that is affiliated with Verizon.

**CATC** means Carrier Account Team Center.

**Central Office (“CO”)** means a building in a wire center area where switching and other equipment and facilities are found.

**Completion interval** means the time in business days or average business days for a special service order to be completed after Verizon has received an “executable service request” (see definition below).

**Customer not ready (“CNR”)** means a situation where a new special services installation (see definition below) cannot be completed by Verizon by the due date, through no fault of Verizon, but because the customer or a connecting carrier is not ready for the installation to be completed. Such a situation must be coded CNR by the Verizon for it to be counted as a CNR.

**Customer service record (“CSR”)** means a record maintained by Verizon that has customer service details and that is commonly referred to as a CSR.

**Due date** means the committed date communicated by Verizon to the customer on the “FOC” (see definition below) or otherwise by which Verizon agrees to complete the order.

**Executable service request (a good ASR or clean ASR)** means a request by ASR, or any other form of special services request, adequate for Verizon to create a service order.

**Firm order commitment (“FOC”)** means Verizon’s response to an initial or supplemental ASR which provides the requesting customer with the specific date by which the requested order will be completed.

**Installation trouble report** means a trouble report where a trouble was found in Verizon’s network within 30 days of order completion.

**ICO** means Independent Company.

**IOF** means Inter-office facilities.

**Internet Service Provider (“ISP”)** means, unless otherwise indicated, an Internet Service Provider not affiliated with Verizon.

**Interexchange Carrier (“IXC”)** means, unless otherwise indicated, an Interexchange Carrier not affiliated with Verizon.

**Jeopardy situation** means a situation in which Verizon changes the due date after having offered or agreed to a due date.

**New special services installation** means (1) an installation for a customer to whom no special services (see definition below) have been previously installed and (2) additions to existing special services installations.

**Non-affiliated carrier** or **CLEC** means a Competitive Local Exchange Carrier not affiliated with Verizon.

**Non-executable service request** means a request by ASR, or other form of special services order, or request for special services that is not adequate for Verizon to create a service order.

**On-line** means using a gateway or access through the Internet.

**On-time installation** means a special service installation completed as verified by Verizon’s customer on or before the first confirmed due date, or by a subsequent customer initiated and verified change in the order due date.

**Outside Plant (“OSP”)** means loop transmission facilities generally used to describe the path between the customer’s premises and the CO.

**Past due order** means an uncompleted order for which the committed due date has passed.

**Policies and practices relating to employees** means any policy, practice or goal relating to employee evaluation, promotion, retention, or compensation.

**Special services** means any service dedicated to a customer that requires circuit design including, but not limited to, any service with four wires; and any DS0, DS1, DS3 or OCn.

**Trouble report** means any customer direct or referred report of impaired service or an out-of-service condition where the trouble was found to be in Verizon’s network or a trouble condition was not found.

**Verizon Retail** means an end-user that purchases any special services (as defined above) directly from Verizon under any tariff.

## INFORMATION REQUESTS

1. In response to ATT-VZ 1-1, Verizon states that 6 of the 376 retail access interstate DS1 circuits for February 2001 were provisioned through the center under the responsibility of Nancy McFeeley. Please provide an explanation and all supporting documentation as to why these six circuits were provisioned out of the McFeeley center as opposed to the Cannell center.
2. Please state whether all retail access intrastate circuits are provisioned by the McFeeley center. If such circuits not always provisioned by the McFeeley center, please provide an explanation and all supporting documentation.
3. Please provide all policies, practices and procedures used by Verizon to determine whether orders are processed through the Retail Procedures (through the Cannell provisioning center) or through the Wholesale Procedures (through the McFeeley provisioning center).
4. Assume that Verizon will provision a DS1 circuit from point A to point B where point A is the end-user's premises and point B is either a carrier's POP or Verizon's location:
  - a. State the charges that would be billed to an end-user customer when the end-user orders and Verizon installs a DS1 circuit, provisioned from the customer's premises to a wholesale carrier POP location, versus the charges that would be billed to the same end-user customer for the same DS1 circuit if the customer had purchased a Verizon service which relied on a DS1 circuit provisioned from the end-user customer's premises to the appropriate Verizon location.
  - b. State the cost to Verizon of provisioning the DS1 circuit in (a) from the end-user customer's premise to a wholesale carrier's POP versus the cost to Verizon of provisioning the DS1 circuit in (a) from the end-user customer's premise to the appropriate Verizon location.

Please provide support for your response.

5. With respect to the handouts provided by Verizon at the December 13, 2001, technical session, please identify what each listed acronym stands for (*e.g.*, "SOEC/SS" in the fifth box, and "NE Provisioning" in the sixth box of the handout entitled *DTE Special Services Work Flow Process*), and for each such database, organization, system, *etc.*, referred to by an acronym in the handouts, please provide a brief description of its role in the work flow process.
6. Refer to the December 13, 2001 Technical Session Tr. 10:8-21. Please identify the function and purpose of "NetExpress." Please include in your answer the extent to which NetExpress differs from RequestNet.

7. Refer to Tr. 10:22 to 11:3, 12/13/01.
  - a. Does the identified portion of the transcript accurately reflect what was said by Verizon representatives at the technical session? If not, please identify how the transcript should read.
  - b. Does the identified portion of the transcript represent a true and accurate response by Verizon representative(s) to the question(s) posed? If not, please explain in detail how the response is inaccurate and provide an accurate response.
  - c. Please identify on each of the handouts provided by Verizon at the December 13, 2001 technical session the point at which "[a]ll the necessary facility equipment is obtained". Please provide a detailed explanation of what is meant by the phrase "[a]ll the necessary facility equipment is obtained at that point."
8. Please identify on each of the handouts provided by Verizon at the December 13, 2001 technical session the point at which a customer request for services or facilities becomes an "order" as that term is used by Verizon. Please define the term "order" as used by Verizon in the context of the provision of special access services and special services.
9. Refer to Tr. 13:17 to 15:4, 12/13/01.
  - a. Does the identified portion of the transcript accurately reflect what was said by Verizon representatives at the technical session? If not, please identify how the transcript should read.
  - b. Does the identified portion of the transcript represent a true and accurate response by Verizon representative(s) to the question(s) posed? If not, please explain in detail how the response is inaccurate and provide an accurate response.
  - c. Please explain in detail what is meant by "RequestNet, the system itself, will dialogue with our downstream systems and will grab the facility and hold it or that order." (Tr. 14:24 to 15:3, 12/13/01).
  - d. Please explain how the process discussed in the foregoing question differs from "reserving" the facilities (see Tr. 13:17-24, 12/13/01; see also Tr. 75:8-15, 12/13/01).
  - e. Please identify on each of the handouts provided by Verizon at the December 13, 2001 technical session the point at which RequestNet "will grab the facility and hold it." To the extent this point in the work flow process does not occur on each of the handouts, please explain why it does not occur, and identify, if possible, the point that is most analogous to this point in the work flow process.

- f. Is the universe of facilities available to be “grabbed” or “reserved” for Verizon retail customers identical in all respects to the universe of facilities available to be “grabbed” for carriers seeking special access facilities from Verizon? If not, please explain in detail the manner in which they are different and provide all supporting documentation.
10. Please identify the differences in the timing and use of RequestNet for servicing different categories of customers identified in Instruction 13. In providing this response, please explain in detail how and when Verizon can access RequestNet to check the availability of facilities and/or to “grab” or “reserve” facilities for current and potential retail customers (*i.e.*, end-users of Verizon’s services). If the answer is different depending on the size of the customer (*i.e.*, if large corporations with significant telecommunications needs are handled differently than small business customers) please explain the differences in your answer.
11. Refer to Tr. 15:15-21, 12/13/01.
  - a. Does the identified portion of the transcript accurately reflect what was said by Verizon representative(s) at the technical session? If not, please identify how the transcript should read.
  - b. Does the identified portion of the transcript represent a true and accurate response by Verizon representative(s) to the question(s) posed? If not, please explain in detail how the response is inaccurate and provide an accurate response.
  - c. Please identify on each of the handouts provided by Verizon at the December 13, 2001 technical session the point at which a “dummy order” is created. To the extent this point in the work flow process does not occur on each of the handouts, please explain why it does not occur, and identify, if possible, the point that is most analogous to this point in the work flow process.
  - d. What is the “given amount of time” in which a dummy order is held before it is released? If the “given amount of time” is different for different categories of customers or different types of circuits (DS0, DS1, DS3, *etc.*), please identify each such amount of time and explain why the amounts of time are different.
12. Refer to Tr. 31:23 to 33:10, 40:18-23, 12/13/01.
  - a. Does Verizon or any affiliated entity have the legal authority to provide retail interLATA, intrastate special services to end-user customers in Massachusetts? If so, please identify name of the affiliate or subsidiary through which such services are offered to end-user customers, and the manner(s) in which such services are offered to the public (*e.g.*, by reference to a specific tariff).

- b. Does Verizon or any affiliated entity have the legal authority to provide retail interLATA, interstate special services to end-user customers in Massachusetts? If so, please identify the name of the affiliate or subsidiary through which such services are offered to end-user customers, and the manner(s) in which such services are offered to the public (*e.g.*, by reference to a specific tariff).
- 13. Refer to Tr. 91:13 to 93:4, 12/13/01.
  - a. Does the identified portion of the transcript accurately reflect what was said by Verizon representatives at the technical session? If not, please identify how the transcript should read.
  - b. Does the identified portion of the transcript represent a true and accurate response by Verizon representative(s) to the question(s) posed? If not, please explain in detail how the response is inaccurate and provide an accurate response.
  - c. Is the category “uncoded CATC” discussed in Verizon’s response to IR WCOM/ATT-VZ 1-7 reserved only for misses that cannot otherwise be categorized, or is it possible that the “uncoded CATC” category includes misses which appropriately belong in other categories. Please explain.
- 14. Refer to Tr. 99:22 to 100:9, 12/13/01. Please identify the processes by which Verizon “track[s its] performance internally,” including identifying whether the data is collected and analyzed on a per order basis, a per circuit basis, or some other basis.
- 15. For each customer category (identified in Instruction 13) ordering special access or special services, please indicate whether Verizon provides web-based access to obtain the status of a pending order.
  - a. If such access is available, please provide a description of the web-based order status or tracking system, and screen-prints of the pages available to each customer category (identified in Instruction 13) able to query this application.
  - b. If such access is not currently available, does Verizon plan to implement such a system? If so, please identify the customer categories (identified in Instruction 13) that will be able to access the system, and the projected in-service date for the system with respect to each customer category.
- 16. For each customer category (identified in Instruction 13), please identify on the accompanying chart:
  - a. The tariff (or other mechanism) through which the customer can purchase special services or special access services.
  - b. Whether customers in a given category can order service through that tariff



(or other mechanism).

- c. Whether the type of service that can be purchased is considered by Verizon a “special service” or “special access service.”
- d. Whether the type of service that can be purchased is considered by Verizon to be “wholesale” or “retail.”
- e. Whether the type of service that can be purchased is intraLATA instate interLATA, or interstate interLATA.

		FCC 11	FCC Other (Identify)	DTE 10	DTE 15	DTE Other (Identify)
<b>End User</b>	Order Service?					
	Retail/Wholesale					
	Special Access or Special Service?					
	IntraLATA, InterLATA/intra state or InterLATA/interstate?					
<b>Affiliated Carrier</b>	Order Service?					
	Retail or Wholesale?					
	Special Access or Special Service?					
	IntraLATA, InterLATA/intra state or InterLATA/interstate?					
<b>Non-affiliated Carrier</b>	Order Service?					
	Retail or Wholesale?					
	Special Access or Special Service?					
	IntraLATA, InterLATA/intra state or InterLATA/interstate?					

17. For each report dimension and service disaggregation indicated in Instruction 13, state, as of the end of each month, the number of open orders (backlog) that have been in a hold status for more than 10 calendar days or 30 calendar days. By “open order”, WorldCom and AT&T mean a valid order that has not been completed. Open orders in a hold status include:
  - a. open orders that have passed the originally committed completion date (the FOC due date for Carrier orders) due to Verizon reasons; and
  - b. open orders that have not been assigned a completion date due to Verizon reasons.
18. Please state for each month listed in attachment 4 to the Verizon September 7, 2001 Report, the number of orders from VADI.
19. Please refer to the October 11, 2001 Technical Session Tr. 31:13 where Nancy McFeeley uses the term “capacity planning.” Please define that term.
20. Please state the organization and individuals within Verizon responsible for capacity planning for special access services. Please provide a description and all supporting documentation of Verizon’s capacity planning. Please state the extent to which Verizon engineers are involved in Verizon capacity planning.
21. For each report dimension and service disaggregation indicated in Instruction 13, state for each month:
  - a. the number of circuits for which Verizon missed the due date; and
  - b. the number of such circuits that were forecasted by carriers (in the aggregate, not forecasts specific to each carrier).
22. Please state whether Verizon’s capacity planning includes projections for increases in outside plant. If so, please state:
  - a. whether Verizon outside plant planners use information regarding the number of circuits for which Verizon misses the due date in order to determine geographically if there is a pattern of orders missed;
  - b. whether Verizon’s capacity planning utilizes maintenance reports of troubles found in Verizon’s network in outside plant to indicate where outside plant is experiencing problems; and
  - c. whether Verizon outside plant planners utilize the forecasts provided to Verizon by carriers.

23. For calendar years 1999, 2000 and 2001, please provide:
- a. Verizon's projected demand for outside plant;
  - b. the expenditures Verizon made in response to this projected demand; and
  - c. the process by which Verizon develops its projected demand for outside plant.

Please state whether Verizon met the projected demand for calendar years 1999, 2000 and 2001.

24. Please provide Verizon's capital budgets for the installation of facilities (*i.e.*, OSP, IOF, CO equipment) over which special services could be provided for calendar years 1999, 2000, and 2001 for the following states:
- a. New York;
  - b. New Jersey;
  - c. Pennsylvania; and
  - d. Delaware.
25. Please provide a description of the Connecting Facility Assignment database referred to at Tr. 88, 10/11/01, and state how often that database is updated.
26. Please provide a description and all documentation concerning the "performance improvement plan" implemented by Nancy McFeeley. Refer to Tr. 92, 10/11/01. This description should include, but is not limited to:
- a. when the performance improvement plan was developed and when it went into effect;
  - b. the states which the performance improvement plan covers;
  - c. the services which the performance improvement plan covers;
  - d. the standards and/or practices set by the performance improvement plan;
  - e. the standards and/or practices implemented as a result of the performance improvement plan;
  - f. the effects, whether beneficial or detrimental, of the performance improvement plan; and
  - g. whether the improvement plan will be sufficient to equalize performance in the states covered by the performance improvement plan. Please state the basis for the response to this request.

27. Please state what, if any, differences exist between the markets in New York and in Massachusetts such that the New York guidelines for special access would not be applicable in Massachusetts.
28. Please state, what, if any, differences exist between the process used to provision interstate circuits in Massachusetts compared to other jurisdictions.
29. Please state, what, if any, differences exist between the process used to provision intrastate circuits in Massachusetts compared to other jurisdictions.
30. Please state whether Verizon includes data on both carrier customers and end-user customers (identified in Instruction 13) in its ARMIS Report to the Federal Communication Commission.
31. Please state whether the Verizon CATC(s) which direct the provisioning of special access circuits determines the reasonableness of the time projected by Verizon engineers to install facilities for a requested circuit. Please provide all documentation supporting the response to this request.
32. Please state who determines whether a carrier customer (identified in Instruction 13) will order special access circuits under the state tariff, D.T.E. Tariff 15, or under the federal tariff, FCC Tariff 11. Please state whether Verizon provides any service or documentation to carriers to assist the carrier customer in ordering services from Verizon.

33. Please state how a retail end-user customer or potential customer contacting Verizon for service would know to choose to order special access under the state or federal tariff.

Respectfully submitted,

**WORLDCOM, INC.**

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